



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1868

E.H. & R.S.
MAR 15 2010

MAR 11 2010

Ms. Mary Lou Capichioni
Director
Remediation Services
Corporate Environmental Services
The Sherwin-Williams Company
101 Prospect Avenue, N.W.
Cleveland, OH 44115-1075

Re: Vacant Lot and Associated Reach of White Sand Branch
Gibbsboro, New Jersey
Administrative Order Index No. II CERCLA-02-99-2035
"Evaluation of Soil and Sediment Analytical Results and Recommendation to Complete
Soil and Sediment Delineation", dated December 9, 2009

Dear Ms. Capichioni:

The United States Environmental Protection Agency (EPA) has reviewed the following December 9, 2009 document: "Evaluation of Soil and Sediment Analytical Results and Recommendation to Complete Soil and Sediment Delineation", for the Vacant Lot and Associated Reach of White Sand Branch, submitted by the Sherwin-Williams Company and finds the proposal for additional sampling to be appropriate. As a result, EPA approves the proposed additional field activities; however, the following three (3) items are to be addressed:

1. Please ensure that the sediment sample(s) are also analyzed for percent solids, as this is not discussed on Page 7 of the proposal.
2. The use of non-residential direct contact soil remediation standards (NRDCSRS) for purposes of comparison on Figures 7-9 does not correspond with the residential direct contact soil remediation standards (RDCSRS) used as the screening criteria in the narrative. The color key used in Figures 7-9 should be based on multiples of the RDCSRS (19 mg/kg for As and 400 mg/kg for Pb), e.g., 2 x residential, 5 x residential, 10 x residential, etc. This would make order of magnitude differences clearer by comparing the results to only one standard, not two standards. Also the arsenic RDCSRS and NRDCSRS are the same (19 mg/kg) but the corresponding two standards for lead (400 and 800 mg/kg) are not, so using multipliers of both residential and non-residential standards is in effect using different multipliers for presentation of lead and arsenic results.

3. Units are not provided on Figures 7-9 for the results. Because some of the results are so high, some readers could confuse parts per billion (ppb) with parts per million (ppm).

Please notify EPA prior to any field activities to be conducted at the Vacant Lot or associated reaches of White Sand Branch.

If you have any questions on this matter, you may contact Mr. Ray Klimcsak, at (212) 637-3916, or if you have any legal concerns, Mr. Carl Howard, Esq., at (212) 637-3216.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Carole Petersen", with a stylized flourish at the end.

Carole Petersen, Chief
New Jersey Remediation Branch

cc: John Doyon, NJDEP